

1 Daniel P. Struck (*admitted pro hac vice*)
2 AZ Bar No. 012377
3 Rachel Love (*admitted pro hac vice*)
4 AZ Bar No. 019881
5 Jacob B. Lee
6 NV Bar No. 012428
7 Ashlee B. Hesman
8 NV Bar No. 012740
9 Anne M. Orcutt (*admitted pro hac vice*)
10 AZ Bar No. 029387
11 Eden G. Cohen (*admitted pro hac vice*)
12 AZ Bar No. 034529
13 STRUCK LOVE BOJANOWSKI & ACEDO, PLC
14 3100 West Ray Road, Suite 300
15 Chandler, Arizona 85226
16 Telephone: (480) 420-1600
17 dstruck@strucklove.com
rlove@strucklove.com
jlee@strucklove.com
ahesman@strucklove.com
aorcutt@strucklove.com
ecohen@strucklove.com

18 Gina G. Winspear
19 Nevada Bar No. 005552
20 DENNETT WINSPEAR, LLP
21 3301 North Buffalo Drive, Suite 195
22 Las Vegas, Nevada 89129
23 Telephone: (702) 839-1100
24 gwinspear@dennettwinspear.com

25 *Attorneys for Defendant CoreCivic, Inc.*

26 UNITED STATES DISTRICT COURT

27 DISTRICT OF NEVADA

28 Kathleen Bliss, on behalf of herself, the
Proposed Nationwide Rule 23 Class, and the
Proposed Nevada Subclass,

Plaintiff,

v.
29 CoreCivic, Inc.,

Defendant.

NO. 2:18-cv-01280-JAD-EJY

**DEFENDANT'S UNOPPOSED
MOTION FOR EXTENSION OF
DEADLINE FOR RESPONSE TO
PLAINTIFF'S MOTION TO COMPEL
DEFENDANT'S RESPONSES TO
INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
(Dkt. 187)**
**(EXPEDITED CONSIDERATION
REQUESTED)**

30 Defendant CoreCivic respectfully requests a one-week extension of the deadline to file its
31 response to Plaintiff's Motion to Compel Defendant's Responses to Interrogatories and Requests
32

1 for Production of Documents (Dkt. 187). This request is necessary because Defendant and defense
2 counsel are currently engaged in (1) analysis and preparation of deliverables to aid both parties in
3 finalizing search terms, custodians, and amended protocols to meet the April 29, 2022 deadline for
4 agreement as to the second-stage ESI collection/production process; and (2) ongoing preparation
5 of CoreCivic's 30(b)(6) deponent to testify regarding the 47 facilities at issue at the 30(b)(6)
6 deposition set for April 25, 2022. This is the first requested extension of the deadline for
7 Defendant's response to Plaintiff's Motion. Plaintiff does not object to the requested extension,
8 and it will not impact any other case deadlines, given that there is no trial date set, and Plaintiff's
9 deadline for disclosing class certification experts is not until September 2022. Accordingly,
10 Defendant requests that the Court extend the deadline from April 22, 2022 to April 29, 2022.

11 DATED this 20th day of April, 2022.

12 STRUCK LOVE BOJANOWSKI & ACEDO, PLC
13

14 By /s/ Anne M. Orcutt

15 Daniel P. Struck
16 Rachel Love
17 Jacob B. Lee
18 Ashlee B. Hesman
19 Anne M. Orcutt
20 Eden G. Cohen
21 3100 West Ray Road, Suite 300
Chandler, AZ 85226
dstruck@strucklove.com
rlove@strucklove.com
jlee@strucklove.com
ahesman@strucklove.com
aorcutt@strucklove.com
ecohen@strucklove.com

22 **IT IS SO ORDERED.**

23 
24 U.S. MAGISTRATE JUDGE

25 Dated: April 21, 2022

26 Gina G. Winspear
DENNETT WINSPEAR
3301 North Buffalo Dr., Suite 195
Las Vegas, NV 89129
gwinspear@dennettwinspear.com

27 28 *Attorneys for Defendant CoreCivic, Inc.*